



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 28, 2022

By ECF

The Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *United States v. Karim Elkorany,*
 20 Cr. 437 (NRB)**

Dear Judge Buchwald:


The Government respectfully submits this letter in the above-captioned matter to request, with the consent of the defendant, that (a) a trial date be set, and (b) time be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from today, February 28, 2022, until the trial date or an earlier pretrial conference should the Court wish also to set a pretrial conference date, to permit time for the parties to continue to discuss a potential pretrial disposition of this matter, and, if those discussions do not come to fruition, to prepare for trial.

Since the Government wrote the Court late last month, the parties have engaged in productive discussions regarding a potential pretrial disposition. The parties have not yet reached an agreement, and may not reach one, but intend to continue their discussions. However, given the length of time for which this matter has been pending, and the nature of this matter, the Government requests that the Court schedule trial to commence on a date available to and convenient for the Court, which the Government understands would likely be in the third quarter of 2022 in light of the District Court's current trial date assignment system. *See* 18 U.S.C. § 3771(a)(7) (victims have the right "to proceedings free from unreasonable delay").

With respect to scheduling, defense counsel have advised that they have another case scheduled to proceed to trial in the third quarter of this year, but without a precise date, and that one or both defense counsel are unavailable June 9-10, June 14, July 23-August 6, and October 7-21.

Application granted. The Court excludes time under the Speedy Trial Act until March 17, 2022.
See 18 U.S.C. § 3161(h)(7)(A).

SO ORDERED.



NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: March 2, 2022
 New York, N.Y.

Honorable Naomi Reice Buchwald
United States District Judge
February 28, 2022
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Respectfully submitted,

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cc: (by ECF)

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